

Respectfully submitted this 5th day of September, 2023.

CHAMBLEE RYAN, P.C.

/s/ Jack Ternan
JACK TERNAN
SBN: 24060707
2777 N. Stemmons Freeway, Suite 1257
Dallas, Texas 75207
Tel: (214) 905-2003
Fax: (214) 905-1213
jternan@cr.law

**ATTORNEY FOR DEFENDANTS SAFE
& GREEN CORP. AND PAUL GALVIN**

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2023, I electronically filed the foregoing with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court, and served a true and correct copy of this document on the following attorneys of record as indicated below:

Aaron Z. Tobin
Jared T.S. Pace
Condon Tobin Sladek Thornton Nerenberg PLLC
8080 Park Lane, Suite 700
Dallas, Texas 75231
Attorneys for Plaintiffs

Via E-Mail: atobin@condontobin.com
jp pace@condontobin.com

/s/ Jack Ternan
JACK TERNAN

EXHIBIT A

4. SG Blocks is a Delaware corporation. It may be served through its registered agent, CT Corporation System, at 1999 Bryan St., Ste. 900, Dallas, Texas 75201, or wherever it may be found.

5. Galvin is an individual residing in Dade County, Florida. He may be served at 990 Biscayne Blvd., Suite #501, Office 12, Miami, Florida 33132, or wherever he may be found.

JURISDICTION AND VENUE

6. Jurisdiction: This court has subject-matter jurisdiction under the Texas Uniform Declaratory Judgment Acts (TEX. CIV. PRAC. & REM. CODE § 37.001, et seq.), and because the relief sought is within the jurisdictional limits of the court. The court has personal jurisdiction over SG Blocks and Galvin because they have sufficient minimum contacts with Texas and exercising jurisdiction over them would not offend traditional notions of fair play and substantial justice. Specifically, and without limitation, SG Blocks and Galvin are parties to the agreement that is the subject of this lawsuit, and that agreement establishes exclusive jurisdiction and venue in Dallas over all proceedings arising in connection with the agreement. It also establishes the laws of Texas as those governing the agreement. SG Blocks and Galvin waived any right to assert otherwise. And, SG Blocks and Galvin entered into the agreement with two Texas residents: CPF GP and Capital Plus.

7. Venue: Venue is proper in Dallas County because it is the county in which all or a substantial part of the events or omissions giving rise to the claim occurred. TEX. CIV. PRAC. & REM. CODE § 15.002. Venue is also proper because Defendants agreed in writing that Dallas would be the exclusive venue for this lawsuit. *Id.* at § 15.020. Finally, venue is proper as to all Defendants where it is proper as to any of them. *Id.* at § 15.005.

BACKGROUND

- (a) **Defendants waived, released, and forever discharged all demands and claims against CPF GP and Jacobson.**

8. CPF GP is the managing member of CPF MF 2019-1, LLC, a Delaware limited liability company (“CPF MF”), and Jacobson is the principal of CPF GP.

9. In 2019, CPF MF began developing a multi-family real estate project in Monticello, New York, known as “Monticello Mews.”

10. Defendants played various roles in the project. Initially, SG Blocks held membership interests in CPF GP, but SG Blocks withdrew as a member on October 3, 2019.

11. Nonetheless, SG Blocks and its CEO, Galvin, stayed involved in the project as lenders. SG Blocks documented a commitment to loan the amount of \$750,000 to CPF GP pursuant to a loan agreement with an effective date of October 3, 2019. Pursuant to the commitment under that loan agreement, SG Blocks made an advance to CPF GP dated effective January 21, 2020 in the amount of \$400,000, Galvin made an advance to CPF GP dated effective January 21, 2020 in the amount of \$100,000, and SG Blocks documented another advance to CPF GP in the amount of \$250,000 with an effective date of April 15, 2020. Each of the loans mature on July 31, 2023.

12. SG Blocks also acted as a licensor with respect to the project. Around the same time as the loans, SG Blocks licensed certain technology to CPF GP with respect to the project. But, in 2021 a dispute arose concerning payments allegedly due under the license agreement.

13. On June 15, 2021, all parties to this case resolved the licensing dispute and documented the terms in a Settlement and Mutual Release Agreement (“Settlement Agreement”).

14. Under the Settlement Agreement, SPG – on behalf of itself and its “employees, agents, directors, [and] officers” – “irrevocably and unconditionally waiv[ed], release[ed], and

forever discharge[ed] . . . CPF GP . . . and Greg Jacobson . . . from any and all Released Claims.” See Settlement Agreement, § 4. The term “Released Claims” includes any and all claims and “demands of any kind and nature . . . known or unknown” that relate to “the operation, opportunities, prospects, and management of CPF GP or CPF MF and their respective business and affairs and/or . . . the relationship and interaction between or among the Parties up to and including the Effective Date” See *id.* The Settlement Agreement defines the “Effective Date” as June 15, 2021, and Galvin signed as the Chairman and CEO of SG Blocks.

15. Defendants even acknowledged in the Settlement Agreement that “there is a risk that, subsequent to the execution of [the Settlement Agreement], they may discover claims or facts in addition to, or different from, those which they know or believe to exist,” but nonetheless, they agreed to “assume the risk of such unknown and unanticipated claims and facts.” See Settlement Agreement, § 4(g).

(b) Defendants make demands and threaten to pursue released claims.

16. From the time the project started in 2019 to the present, economic conditions have changed substantially. Inflation and increased interest rates alone have ballooned the annual costs of each rentable unit to 67% more than its annual revenue. Worse, reduced demand from the COVID era lowered rental rates by 10%.

17. As a result, the project is not viable under the current economic conditions. Time must be allowed for interest rates to subside, inflation to level, and demand to return. Yet, SG Blocks and Galvin demand payment of the loans by their maturity date, July 31, 2023.

18. But they have not stopped at demanding payment for the loans. Rather, SG Blocks and Galvin allege that Jacobson is “walking away from his fiduciary obligations” and that he made

misrepresentations to induce them into making the loans back in 2019 and early 2020 – more than a year before the Settlement Agreement.

19. In particular, SG Blocks and Galvin claim they would have “never advance[d] any loans” had Jacobson not represented that he had partners in the deal with significant financial wherewithal. But of course, any representation SG Blocks and Galvin relied on in “advance[ing] any loans” were made long before SG Blocks and Galvin waived, released, and forever discharged Jacobson and CPF GP from any claims “of any kind or nature.” *See* Settlement Agreement, § 4.

20. Likewise, SG Blocks and Galvin claim that Jacobson – “soon as the approvals [for the project] were obtained” – breached his fiduciary duties by “ignor[ing] his partners and investors, who are experts in the industry, and instead tried to develop the project alone with all new people/outside to the original transaction.” However, again, any claims based on anything Jacobson might have done back when the project obtained approvals were released on June 15, 2021, when SG Blocks and Galvin waived, released, and forever discharged those claims. *See* Settlement Agreement, § 4.

21. Defendants’ demands and threatened claims against Jacobson and CPF GP are meritless and are in fact an attempt to coerce payment of the notes or leverage modification terms that are not feasible. In any event, those demands and threatened claims fall squarely within the Settlement Agreement’s comprehensive releases.

CAUSES OF ACTION

(i) **Declaratory Judgment under Tex. Civ. Prac. & Rem. Code § 37.001, et seq.**

22. Plaintiffs incorporate the preceding paragraphs of this petition as if fully set forth herein.

23. There is a real controversy between the parties that will actually be determined by

the judicial declaration sought in this petition. The controversy is whether the Settlement Agreement released Defendants' threatened claims of breach of fiduciary duties and fraudulent inducement. Indeed, a declaratory judgment is the proper mechanism for adjudicating the rights of parties to a settlement agreement, including whether claims are barred as having been released by a settlement. *See Transcor Astra Grp. S.A. v. Petrobras Am. Inc.*, 650 S.W.3d 462, 468-72 (Tex. 2022); *Garza v. Bunting*, No. 05-06-01307-CV, 2007 WL 1545937, at *2-4 (Tex. App.—Dallas May 30, 2007, no pet.)

24. To resolve the actual controversy, Plaintiffs request a judgment against all Defendants declaring that:

- (a) Section 4 of the Settlement Agreement, titled "Mutual Releases," is valid, binding, and enforceable as to all parties in this case;
- (b) Defendants' threatened claims for breach of fiduciary duty and fraudulent inducement were waived, released, and forever discharged by the Settlement Agreement;
- (c) Defendants are barred from bringing any suit or action on their threatened claims for breach of fiduciary duty and fraudulent inducement or any other claim based on alleged conduct that occurred before June 15, 2021.

(ii) Attorney's Fees

25. Plaintiffs incorporate the preceding paragraphs of this petition as if fully set forth herein.

26. Pursuant to Section 37.009 of the Texas Uniform Declaratory Judgments Act and Section 8(o) of the Settlement Agreement, Plaintiffs plead for and are entitled to recover their attorney's fees and costs incurred in connection with this action.

CONDITIONS PRECEDENT

27. All conditions precedent have been performed or have occurred.

RULE 194 REQUEST FOR DISCLOSURE

28. Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Plaintiffs request Defendants disclose, within 30 days of the service of this request, the information and materials described in Rule 194.2.

WHEREFORE, Plaintiffs respectfully requests that Defendants be cited to appear and answer and that upon final hearing or trial, that Plaintiffs have judgment against Defendants as follows:

- a. the declaratory relief sought herein;
- b. attorneys' fees;
- c. costs of suit; and
- d. such other and further relief to which Plaintiffs may be entitled.

Dated: July 28, 2023

Respectfully submitted,

**CONDON TOBIN SLADEK THORNTON
NERENBERG PLLC**

/s/ Jared T.S. Pace

Aaron Z. Tobin

Texas Bar No. 24028045

atobin@condontobin.com

Jared T.S. Pace

Texas Bar No. 24079098

jpace@condontobin.com

8080 Park Lane, Suite 700

Dallas, Texas 75231

Telephone 214-691-6300

Facsimile 214-691-6311

Attorneys for Plaintiff

EXHIBIT B

THE STATE OF TEXAS

To: **SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC**
BY SERVING ITS REGISTERED AGENT
CT CORPORATION SYSTEM,
1999 BRYAN ST., STE. 900
DALLAS, TEXAS 75201
OR WHEREVER IT MAY BE FOUND

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. on the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **134th District Court** at 600 Commerce Street, Dallas, Texas 75202.

Said Plaintiff being **CPF GP 2019-1, LLC; GREG JACOBSON**

Filed in said Court **28th day of July, 2023** against

SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC; PAUL GALVIN

For Suit, said suit being numbered **DC-23-10507**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies
this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 8th day of August, 2023**

ATTEST: FELICIA PITRE,
Clerk of the District Courts of Dallas County, Texas

By Monica Alvidrez, Deputy
MONICA ALVIDREZ



ESERVE CITATION

No.: **DC-23-10507**

CPF GP 2019-1, LLC, et al

vs.

SAFE & GREEN HOLDINGS CORP, et al

ISSUED

on this the 8th day of August, 2023

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **MONICA ALVIDREZ**, Deputy

Attorney for Plaintiff
JARED THOMAS SMITH PACE
8080 PARK LN STE 700
DALLAS TX 75231-5920
214-265-3800
jp pace@condontobin.com

DALLAS COUNTY
SERVICE FEES
NOT PAID

OFFICER'S RETURN

Cause No. DC-23-10507

Court No.: 134th District Court

Style: CPF GP 2019-1, LLC, et al

vs.

SAFE & GREEN HOLDINGS CORP, et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ .M.

Executed at _____, within the County of _____ at _____

o'clock _____ .M. on the _____ day of _____, 20_____, by delivering to the within named

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____,
20_____, to certify which witness my hand and seal of office.

Notary Public _____ County _____

THE STATE OF TEXAS

To: **PAUL GALVIN**
990 BISCAYNE BLVD STE #501
OFFICE 12
MIAMI FL 33132
OR WHEREVER HE MAY BE FOUND

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. on the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **134th District Court** at 600 Commerce Street, Dallas, Texas 75202.

Said Plaintiff being **CPF GP 2019-1, LLC; GREG JACOBSON**

Filed in said Court **28th day of July, 2023** against

SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC; PAUL GALVIN

For Suit, said suit being numbered **DC-23-10507**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies
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Given under my hand and the Seal of said Court at office **on this the 8th day of August, 2023**

ATTEST: FELICIA PITRE,
Clerk of the District Courts of Dallas County, Texas

By Monica Alvidrez, Deputy
MONICA ALVIDREZ



ESERVE CITATION

No.: **DC-23-10507**

CPF GP 2019-1, LLC, et al
vs.
SAFE & GREEN HOLDINGS CORP, et al

ISSUED
on this the 8th day of August, 2023

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **MONICA ALVIDREZ**, Deputy

Attorney for Plaintiff
JARED THOMAS SMITH PACE
8080 PARK LN STE 700
DALLAS TX 75231-5920
214-265-3800
jpac@condontobin.com

DALLAS COUNTY
SERVICE FEES
NOT PAID

OFFICER'S RETURN

Cause No. DC-23-10507

Court No.: 134th District Court

Style: CPF GP 2019-1, LLC, et al

vs.

SAFE & GREEN HOLDINGS CORP, et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ .M.

Executed at _____, within the County of _____ at _____

o'clock _____ .M. on the _____ day of _____, 20_____, by delivering to the within named

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____,
20_____, to certify which witness my hand and seal of office.

Notary Public _____ County _____

EXHIBIT C

Envelope: UPS LETTER CENTER
WINDOW
Total Pages: 12
SafetySeal(101761)

TERRI THONGSAVAT 2149323601 CT - DALLAS SOP TEAM 1999 BRYAN STREET DALLAS TX 75201		1.0 LBS LTR	1 OF 1
SHIP TO: KEVIN KING 6155852639 SAFE & GREEN HOLDINGS CORP. 2917 BIG LOTS RD DURANT OK 74701			
	OK 747 2-01 		
UPS NEXT DAY AIR TRACKING #: 1Z X21 278 01 1189 3063		1	
			
BILLING: P/P			
Reference No.1: SOP/2401130/544489593/CT SOP Custodian  <small>TM</small>			
<small>XOL 23.07.08 NV45 32.0A 08/2023*</small>			

2056903

30

Origin: Wolters Kluwer UPS 562130



CT Packing Slip

UPS Tracking # : 1ZX21278011893063

Created By : BATCH BATCH

Created On : 08/11/2023 12:50 PM

Recipient :

Kevin King	
Title :	Business Manager
Customer :	Safe & Green Holdings Corp.
Address :	2917 BIG LOTS RD
Email :	kking@sgblocks.com
Phone :	615-585-2639
Fax :	000-000-0000

Package Type : Envelope

Items shipped : 1

Log #	Case #	Entity Name
544489593	DC2310507	Safe & Green Holdings Corp.



08/11/2023

CT Log Number 544489593

Service of Process Transmittal Summary

TO: Kevin King, Business Manager
Safe & Green Holdings Corp.
2917 BIG LOTS RD
DURANT, OK 74701-2172

RE: Process Served in Texas

FOR: Safe & Green Holdings Corp. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: CPF GP 2019-1, LLC and GREG, JACOBSON vs. SAFE & GREEN HOLDINGS CORP.

CASE #: DC2310507

PROCESS SERVED ON: C T Corporation System, Dallas, TX

DATE/METHOD OF SERVICE: By Traceable Mail on 08/11/2023

JURISDICTION SERVED: Texas

ACTION ITEMS: SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780111893063

REGISTERED AGENT CONTACT: C T Corporation System
1999 Bryan Street
Suite 900
Dallas, TX 75201
866-665-5799
SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

CERTIFIED MAIL

5470 L B J FRWY, STE 100
DALLAS, TX 75240



9589 0710 5270 0162 1653 92



US POSTAGE

quodient

FIRST-CLASS MAIL

\$009.73⁹

09/09/2023 ZIP 75240
043M31220598

SAFE & GREEN HOLDINGS CORP F/K/A SG
BLOCKS INC
C/O CT CORPORATION SYSTEM

1988 BRYAN STREET, SUITE 900
DALLAS TX 75201



EXHIBIT D

Cause No. DC-23-10507

CPF GP 2019-1, LLC and GREG JACOBSON,	§	IN THE DISTRICT COURT
	§	
Plaintiffs,	§	134th JUDICIAL CIRCUIT
	§	
v.	§	
	§	
SAFE & GREEN HOLDINGS CORP. f/k/a SG BLOCKS, INC. and PAUL GALVIN,	§	
	§	DALLAS COUNTY, TEXAS
Defendants.	§	

NOTICE OF REMOVAL

TO: Plaintiffs CPF GP 2019-1, LLC and Greg Jacobson, by and through their attorneys of record Aaron Z. Tobin and Jared T.S. Pace, Condon Tobin Sladek Thornton Nerenberg PLLC, 8080 Park Lane, Suite 700, Dallas, Texas 75231.

You are hereby notified that on September 1, 2023, a Notice of Removal of Civil Action, a true and correct copy of which is attached hereto, was filed in the United States District Court for the Northern District of Texas, Dallas Division. The Notice of Removal was filed in reference to Cause No. DC-23-10507, *CPF GP 2019-1, LLC and Greg Jacobson v. Safe & Green Holdings Corp. f/k/a SG Blocks, Inc. and Paul Galvin*, then pending in the 134th Judicial District Court, Dallas County, Texas.

[Signature Page Follows]

Respectfully submitted this 5th day of September, 2023.

CHAMBLEE RYAN, P.C.

/s/ Jack Ternan
JACK TERNAN
SBN: 24060707
2777 N. Stemmons Freeway, Suite 1257
Dallas, Texas 75207
Tel: (214) 905-2003
Fax: (214) 905-1213
jternan@cr.law

**ATTORNEY FOR DEFENDANTS SAFE
& GREEN CORP. AND PAUL GALVIN**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon the following, via e-mail or fax, on the 5th day of September, 2023:

Aaron Z. Tobin
Jared T.S. Pace
Condon Tobin Sladek Thornton Nerenberg PLLC
8080 Park Lane, Suite 700
Dallas, Texas 75231
Attorneys for Plaintiffs

Via E-Mail: atobin@condontobin.com
jp pace@condontobin.com

/s/ Jack TERNAN
JACK TERNAN

EXHIBIT E

Case Information

DC-23-10507 | CPF GP 2019-1, LLC, et al vs. SAFE & GREEN HOLDINGS CORP, et al

Case Number	Court	Judicial Officer
DC-23-10507	134th District Court	TILLERY, DALE
File Date	Case Type	Case Status
07/28/2023	OTHER (CIVIL)	OPEN

Party

PLAINTIFF	Active Attorneys▼
CPF GP 2019-1, LLC	Lead Attorney
	PACE, JARED THOMAS SMITH
	Retained

PLAINTIFF	Active Attorneys▼
JACOBSON, GREG	Lead Attorney
	PACE, JARED THOMAS SMITH
	Retained

DEFENDANT
SAFE & GREEN HOLDINGS CORP

DEFENDANT
GALVIN, PAUL

Events and Hearings

07/28/2023 NEW CASE FILED (OCA) - CIVIL

07/28/2023 ORIGINAL PETITION ▼

ORIGINAL PETITION

08/01/2023 REQUEST FOR SERVICE ▼

RQST LETTER

08/01/2023 ISSUE CITATION ▼

ISSUE CITATION-SAFE & GREEN HOLDINGS CORP

ISSUE CITATION-PAUL GALVIN

08/08/2023 CITATION ▼

Served

08/11/2023

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

08/31/2023

Comment

SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC

08/08/2023 CITATION ▼

Unserved

Anticipated Server

ESERVE

Anticipated Method

Comment

PAUL GALVIN

08/31/2023 RETURN OF SERVICE ▼

EXECUTED CITATION - SAFE & GREEN HOLDINGS CORP

Comment

EXECUTED CITATION - SAFE & GREEN HOLDINGS CORP

Financial

CPF GP 2019-1, LLC

Total Financial Assessment

\$350.00

Total Payments and Credits

\$350.00

7/31/2023	Transaction Assessment			\$350.00
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7/31/2023	CREDIT CARD - TEXFILE (DC)	Receipt # 49925-2023-DCLK	CPF GP 2019-1, LLC	(\$213.00)
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7/31/2023	STATE CREDIT			(\$137.00)
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JACOBSON, GREG

Total Financial Assessment

\$16.00

Total Payments and Credits

\$16.00

8/4/2023	Transaction Assessment			\$16.00
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8/4/2023	CREDIT CARD - TEXFILE (DC)	Receipt # 51286-2023-DCLK	JACOBSON, GREG	(\$16.00)
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Documents

ORIGINAL PETITION

APP026

POST LETTER

ISSUE CITATION-SAFE & GREEN HOLDINGS CORP

ISSUE CITATION-PAUL GALVIN

EXECUTED CITATION - SAFE & GREEN HOLDINGS CORP

EXHIBIT F



Chasity P. Selvy
Legal Assistant

Direct Dial: 214.265.3858
E-Mail: cselvvy@condontobin.com

August 1, 2023

VIA E-FILE

Attn: Citation Department

Dallas County

RE: **Cause No. DC-23-10507**

CFP GP 2019-1, LLC and Greg Jacobson Plaintiffs v. Safe & Green Holdings Corp. f/k/a SG Blocks, Inc. and Paul Galvin, Defendants; in the 134th District Court, Dallas County, Texas

Dear Clerk:

This letter is to request two (2) citation to be issued to the Defendants in the above-referenced matter. The issuance fees have been paid through the e-file system.

Please issue the citations to the Defendants as follows:

Paul Galvin
990 Biscayne Blvd., Suite #501, Office 12
Miami, Florida 33132

SAFE & GREEN HOLDINGS CORP. f/k/a SG BLOCKS, INC.
c/o registered agent, CT Corporation System
1999 Bryan St., Ste. 900
Dallas, Texas 75201

Once the citations have been issued, please email them back to the attorney, Jared T.S. Pace. His email address is jpace@condontobin.com. We will arrange for a private process server.

Thank you for your assistance. If you have any questions, please call me.

Very truly yours,

/s/ Chasity Selvy

Chasity Selvy

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Chasity Selvy on behalf of Jared Pace
 Bar No. 24079098
 cselvy@condontobin.com
 Envelope ID: 78098180
 Filing Code Description: Request
 Filing Description:
 Status as of 8/4/2023 6:09 PM CST

Associated Case Party: GREG JACOBSON

Name	BarNumber	Email	TimestampSubmitted	Status
Jared T.S.Pace		jpace@condontobin.com	8/1/2023 3:29:26 PM	SENT
Chasity Selvy		cselvy@condontobin.com	8/1/2023 3:29:26 PM	SENT

Associated Case Party: CPF GP 2019-1, LLC

Name	BarNumber	Email	TimestampSubmitted	Status
Jared T.S.Pace		jpace@condontobin.com	8/1/2023 3:29:26 PM	SENT
Chasity Selvy		cselvy@condontobin.com	8/1/2023 3:29:26 PM	SENT

EXHIBIT G

CAUSE NO. DC-23-10507**CPF GP 2019-1, LLC and GREG
JACOBSON,****Plaintiff(s),****vs.****SAFE & GREEN HOLDINGS CORP. f/k/a
SG BLOCKS, INC. and PAUL GALVIN,****Defendant(s).**§
§
§
§
§
§
§
§**IN THE DISTRICT COURT****134TH JUDICIAL DISTRICT****DALLAS COUNTY, TEXAS****RETURN OF SERVICE**

Came to hand on **Wednesday, August 9, 2023 at 11:47 AM,**
Executed at: **1999 BRYAN STREET, SUITE 900, DALLAS, TX 75201**
on **Friday, August 11, 2023,** by delivering to the within named:

SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC

By delivering to its **Registered Agent, CT CORPORATION SYSTEM,** by Certified Mail Return
Receipt Requested, tracking number 9589 0710 5270 0162 1653 92, a true copy of this

**CITATION and PLAINTIFF'S ORIGINAL
PETITION AND RULE 194 REQUEST FOR DISCLOSURE**

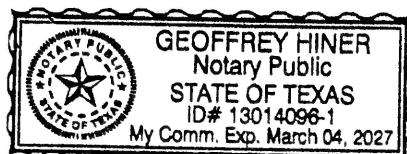
PS Form 3811, received by **TIERICA WILLIAMS** an **Authorized Employee** of the **Registered Agent, CT CORPORATION SYSTEM** is attached to this form.

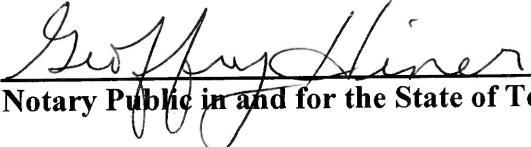
BEFORE ME, the undersigned authority, on this day personally appeared Brittney Woodall who after being duly sworn on oath states: "My name is Brittney Woodall. I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I am familiar with the Texas Rules of Civil Procedure, and the Texas Civil Practice and Remedies Codes as they apply to service of process. I am certified by the Judicial Branch Certification Commission to deliver citations and other notices from any District, County and Justice Courts in and for the State of Texas in compliance with rule 103 and 501.2 of the TRCP."


By:



Brittney Woodall PSC 20304 - Exp 03/31/2024
served@specialdelivery.com

Subscribed and Sworn to by **Brittney Woodall**, Before Me, the undersigned authority, on this
30th day of August, 2023.




Notary Public in and for the State of Texas

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature* <i>Tierica Williams</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Tierica Williams</i> C. Date of Delivery <i>AUG 11 2023</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC C/O CT CORPORATION SYSTEM</p> <p>1999 BRYAN STREET, SUITE 900 DALLAS TX 75201</p>  <p>9590 9402 7192 1284 6118 80</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p>
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 <i>2210240</i> Domestic Return Receipt</p>	

USPS TRACKING #	First-Class Mail
 <p>9590 9402 7192 1284 6118 80</p>	<p>Postage & Fees Paid</p> <p>USPS</p> <p>Permit No. G-10</p>

United States
Postal Service

* Sender: Please print your name, address, and ZIP+4® in this box*

SPECIAL DELIVERY
5470 L B J FRWY, STE 100
DALLAS, TX 75240

FORM NO. 353-3—CITATION
THE STATE OF TEXAS

To: **SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC**
BY SERVING ITS REGISTERED AGENT
CT CORPORATION SYSTEM,
1999 BRYAN ST., STE. 900
DALLAS, TEXAS 75201
OR WHEREVER IT MAY BE FOUND

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. on the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **134th District Court** at 600 Commerce Street, Dallas, Texas 75202.

Said Plaintiff being **CPF GP 2019-1, LLC; GREG JACOBSON**

Filed in said Court **28th day of July, 2023** against

SAFE & GREEN HOLDINGS CORP F/K/A SG BLOCKS INC; PAUL GALVIN

For Suit, said suit being numbered **DC-23-10507**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies
this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office **on this the 8th day of August, 2023**

ATTEST: FELICIA PITRE,
Clerk of the District Courts of Dallas County, Texas

By Monica Alvidrez, Deputy
MONICA ALVIDREZ



**ESERVE
CITATION**

No.: **DC-23-10507**

CPF GP 2019-1, LLC, et al
vs.
SAFE & GREEN HOLDINGS CORP, et al

ISSUED
on this the 8th day of August, 2023

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **MONICA ALVIDREZ**, Deputy

Attorney for Plaintiff
JARED THOMAS SMITH PACE
8080 PARK LN STE 700
DALLAS TX 75231-5920
214-265-3800
jpace@condontobin.com

DALLAS COUNTY
SERVICE FEES
NOT PAID

OFFICER'S RETURN

Cause No. DC-23-10507

Court No.: 134th District Court

Style: CPF GP 2019-1, LLC, et al

vs.

SAFE & GREEN HOLDINGS CORP, et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ .M.

Executed at _____, within the County of _____ at _____

o'clock _____ .M. on the _____ day of _____, 20_____, by delivering to the within named

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____,
20_____, to certify which witness my hand and seal of office.

Notary Public _____ County _____

**RETURN / AFFIDAVIT
PROOF / ATTACHED**